United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, D.C. 20240

MAR 31 2003

MEMORANDUM

To: Task Force Members

From: Ann R. Klee, Chair, South Florida Ecosystem Restoration Task Force

Subject: GAO Report to Congress: *South Florida Ecosystem Restoration: Task Force Needs to Improve Science Coordination to Increase the Likelihood of Success*

Background:
Congress recognizes the importance of science, and independent scientific peer review, as integral to our efforts to restore the Everglades. In the Water Resources Development Act of 1996, Congress charged the Task Force with broad duties to, among other things, "coordinate scientific and other research associated with the restoration of the South Florida ecosystem." Recently, Congress asked the General Accounting Office (GAO) to report on federal and state funds spent on scientific activities for restoration, the gaps that exist in scientific information, and the extent to which scientific activities are being coordinated.

GAO issued its report last week. The report discussed the responsibilities of the Task Force and the Science Coordination Team (SCT), which was established by the Task Force in 1997 to coordinate science activities among the affected agencies.

Report Conclusions and Recommendations:
Generally, the GAO concluded that while scientific understanding of restoration issues has improved, significant gaps remain in the scientific information and adaptive management tools needed for restoration. GAO expressed concern that gaps in the development of scientific information may hinder our ability to achieve success.

GAO also concluded that although the Task Force is responsible for coordinating and managing scientific activities for restoration, it has yet to establish an effective means of doing so. GAO noted that the SCT has not accomplished several of its important tasks that are identified in its charter, a copy of which is attached.

In order to improve the coordination of scientific activities, GAO recommended that the Task Force:

- specify the plans and documents – including a science plan focused on key information gaps, a comprehensive monitoring plan, and progress reports for each plan – that the Science Coordinating Team needs to complete and the timeframes for completing them;

- identify the key management issues that need to be addressed by science planning;

- ensure that scientific issues that are critical to restoration are prioritized and synthesized; and

- evaluate the SCT's current staffing needs so that SCT may adequately carry out its responsibilities.

Task Force Discussion of GAO Recommendations:

The GAO report presents us with an opportunity to review how well we are carrying out our responsibility to coordinate science for the restoration of the South Florida ecosystem. Improving science coordination will allow agencies to maximize resources, avoid duplication of effort, and ensure that the highest priority needs are addressed so that science information is available when needed. As a result, agency decision-making will be improved and public confidence increased.

As we noted in our official comments on the GAO report, the Task Force must decide how to ensure that science coordination is achieved. To start this discussion, I would like to focus our discussion tomorrow on the following questions:

- Does the SCT charter accurately reflect what is necessary to ensure that science coordination is achieved among the agencies involved in this effort? If the charter is not adequate, should it be revised?

- What procedures are necessary to ensure that science is well coordinated and that our science efforts are targeting the work that needs to be accomplished to achieve our restoration goals?

- How should the Task Force respond to GAO's report?

I look forward to discussing these important issues with you tomorrow.

Attachments:

SCT Charter
DOI comments on draft GAO report

South Florida Ecosystem Restoration Task Force

Science Coordination Team Charter

September 30, 1997

A Science Coordination Team (SCT) is hereby established by the Working Group to assist both the Working Group (WG) and Task Force (TF) in meeting their obligations under the Water Resources Development Act of 1996 by ensuring the highest level of communication, coordination, and cooperation in the application of the various scientific disciplines to the ecological and socioeconomic problems of South Florida. The SCT will work under and report to the South Florida Ecosystem Restoration Working Group (WG). The SCT will serve as the senior science advisory group to the WG and TF. The SCT is responsible for recommending research plans and priorities; and facilitating the integration, synthesis, and application of the best scientific information (including the Social Sciences) available for the South Florida Ecosystem Restoration effort. Specific responsibilities and tasks include the following:

1. Provide a scientific basis for the development of ecological and societal goals and objectives, and performance measures for South Florida ecosystem restoration based on the best existing scientific information;
2. Ensure that the completed and ongoing data sets for the South Florida ecosystem restoration effort are catalogued, cross-referenced, and integrated;
3. Ensure coordination of the design, implementation, and progress of system-wide ecological monitoring programs that support the evaluation of restoration success and its sustainability;
4. Identify key gaps in management information for the South Florida ecosystem and related social systems and propose coordinated research, inventory, monitoring, modeling, and information programs to address the gaps;
5. Describe expertise and scientific investigations required to respond to key gaps in support of restoration management objectives;
6. Describe and coordinate the expertise and scientific investigations required to document long-term ecosystem and social system effects realized by implementation of restoration and management objectives;
7. Identify future science needs and recommended priorities for a coordinated science and research program to address long-term restoration requirements;
8. Periodically review and revise priorities based on evaluation of progress toward achieving sustainable restoration objectives;
9. Facilitate the exchange of scientific information and the use of interdisciplinary and partnership approaches by establishing advisory panels and convening scientific meetings, conferences, and symposia on topics relevant to the South Florida ecosystem.

The membership of the Science Coordination Team (SCT) will consist of the following:

a) Seven Working Group (WG) members designated annually by the WG;

b) Seven scientists employed by the WG agencies coordinating with each of the Project Coordination Teams (PCT), including the Total Systems Team. These will be nominated by the seven WG members of the SCT and approved by the larger WG; and,
c) any member of the WG not on the SCT designate someone to represent them on the SCT.

The SCT will designate members of the SCT or request WG agencies to send additional individuals to SCT meetings to serve as technical advisors and/or communication/ coordination liaisons between the SCT and major interagency scientific enterprises (e.g.- Florida Bay PMC, ATLSS Modeling, Mercury Pollution Studies etc.). Organized entities already established (e.g.- the Florida Bay PMC) will be consulted as to the appropriate individual who might serve as a liaison.

The SCT will nominate advisory panels made up of scientists in the appropriate disciplines who will then be appointed by the WG. The SCT will convene these panels at least annually to review scientific plans and progress in regard to Ecosystem Restoration science. These panels may periodically supplement their activities by appointing targeted subject matter expert panels and working with the SCT to convene topical workshops to help address specific questions. These panels (and workshops) are seen as critical elements of the SCT if it is to provide the best possible scientific information to the WG.

The SCT will elect co-chairs at least one of which will be a WG member of the SCT. These chairs will set the agenda of the SCT meetings, make preliminary designations of work assignments and assure timely completion and delivery of assignments to the Working Group and/or Task Force. A quorum of the SCT will consist of 50% + 1 of the total number of voting members. The SCT may recommend to the WG such changes or additions as it deems necessary.

All business of the SCT shall be conducted by consensus or by vote of the SCT members with appropriate provision for written minority opinions.

Continuing SCT membership is contingent upon sufficient participation to adequately perform SCT responsibilities.

The full SCT shall meet no less than quarterly.

All meetings of the full SCT shall be publicly noticed and provide an opportunity for public comment.

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FEB 19 2003

Mr. Barry T. Hill
Director, Natural Resources and Environment Team
U.S. General Accounting Office
441 G Street, NW
Washington, D.C. 20548

Dear Mr. Hill:

The Department of the Interior appreciates the opportunity to review the General Accounting Office (GAO) draft report entitled *South Florida Ecosystem Restoration: Task Force Needs to Improve Science Coordination to Increase the Likelihood of Success* (GAO-03-345).

We appreciate the focus the report provides on Everglades science programs, which are integral to guiding the four-decade intergovernmental restoration effort to success. As steward of approximately one-half the remaining Everglades, the Department agrees with the GAO that improved coordination among multi-agency science programs is necessary. In doing so, agencies will maximize resources, avoid duplication of effort, share scientific expertise and ensure that the highest priority scientific needs are addressed in a timely fashion. Proper coordination of science programs will ensure that the best available science is incorporated into decision-making and that monitoring and assessment functions are based upon sound scientific principles.

Everglades restoration is a complex undertaking that will take place over the next four decades, with many factors contributing to the total effort. It is therefore not surprising that gaps remain in the scientific understanding of how certain projects should be designed, or work together, to achieve a restored Everglades ecosystem. As agencies move forward with implementing the many projects that collectively comprise the Everglades restoration effort, we agree with GAO that project-specific gaps need to be filled to ensure that projects perform as anticipated and contribute toward restoration.

Although we agree with the major premises in the report, we have some concerns that the report does not adequately acknowledge existing processes to obtain scientific information (and fill scientific gaps) for ongoing Everglades restoration projects. For example, the Comprehensive Everglades Restoration Plan (CERP) provides mechanisms to address gaps in scientific information. Although only recently authorized, CERP is based upon nearly two decades of scientific inquiry associated with understanding the natural hydrology of the Everglades. In large part, CERP is meant to improve the quantity, quality, timing and distribution of water for the Everglades natural system. This in turn is anticipated to result in improved ecological

performance, thereby facilitating achievement of the three primary Everglades restoration goals, which are generally described in the report. Despite the scientific basis upon which CERP was developed, specific questions remain on the performance of certain CERP features, particularly aquifer storage and retrieval and wastewater reuse, and how best to implement individual CERP component features, both authorized and those requiring future authorization.

The Department anticipates that the Corps of Engineers' pilot projects, which will investigate uncertain technologies and planning processes, will address the gaps in information in an orderly way so that sufficient scientific information is available prior to finalizing project-specific designs, or before additional projects are submitted to the Congress for future authorization. Additionally, CERP implementation procedures, including an adaptive management program, are described in the Corps of Engineers' draft programmatic regulations, which were released to the public last summer and are anticipated to be finalized later this year. For example, the draft regulations specifically implement the requirements of the Water Resources Development Act of 2000 (P.L. 106-541), which requires processes to, among other things, *"ensure that new information resulting from changed or unforeseen circumstances, new scientific or technical information or information that is developed through the principles of adaptive management contained in the Plan, or future authorized changes to the Plan are integrated into the implementation of the Plan"* (emphasis added). The processes proposed by the programmatic regulations ensure that sufficient scientific information will be acquired and integrated into CERP decision-making, monitoring and assessment protocols will be established, and management actions will be based upon this information so that restoration is achieved.

To assist the Corps' efforts to implement CERP, as well as implement other ongoing projects to achieve Everglades restoration goals concerning habitat restoration and recovery of endangered species, we are improving the coordination of our own science programs through the development of a Department of the Interior Science Plan.

Our science plan is a direct result of improved coordination among Interior bureaus. Last year, the U.S. Geological Survey, the National Park Service, the Fish and Wildlife Service and the Department executed a Memorandum of Understanding to coordinate Everglades science programs. The Department's science plan will support the needs of the National Park Service and Fish and Wildlife Service - our land managing agencies - in implementing Everglades restoration programs, including CERP. The science plan is being developed under the leadership of the Geological Survey and will identify the issues that must be resolved through further scientific inquiry for each restoration project underway. Once the issues are identified, the plan will describe the adequacy of the scientific information gathered to date, any gaps that remain, and a strategy to acquire sufficient scientific knowledge so that agency decisions may be based upon sound science. As part of this effort, the Geological Survey will coordinate our science with our federal, tribal and state partners by establishing the Greater Everglades Science Coordination Council. The Council's first meeting is this month and we hope to have the science plan completed by the end of the first half of this year. If we are successful, our science plan may

serve as a model to other Task Force agencies who also manage science programs contributing to the restoration effort. Additionally, to improve coordination among Interior bureaus, the FY 2004 President's Budget proposes to consolidate our Everglades science program funding under the Geological Survey.

While we agree that improved coordination of scientific activities for the South Florida ecosystem restoration initiative is necessary, we also have some concerns with the report's characterization of the role of the Task Force. As you know, Section 528 of the Water Resources Development Act of 1996 (P.L. 104-303, "WRDA 1996") established the intergovernmental South Florida Ecosystem Restoration Task Force and its Florida-based Working Group to, among other things, coordinate consistent policies, strategies, plans and programs to address the restoration, preservation and protection of the South Florida ecosystem. The Secretary of the Interior is designated by statute as Task Force chair. Specifically, WRDA 1996 provides, in relevant part, that the Task Force:

> *(B) shall coordinate the development of consistent policies, strategies, plan, programs, projects, activities, and priorities for addressing the restoration, preservation, and protection of the South Florida ecosystem;*
>
> *(C) shall exchange information regarding programs, projects, and activities of the agencies and entities represented on the Task Force to promote ecosystem restoration and maintenance;*
>
> *(D) shall establish a Florida-based working group which shall include representatives of the agencies and entities represented on the Task force as well as other governmental entities as appropriate for the purpose of formulating, recommending, coordinating, and implementing the policies, strategies, plans, programs, projects, activities, and priorities of the Task Force;*
>
> ...
>
> *(G) shall coordinate scientific and other research associated with the restoration of the South Florida ecosystem;*

Although the Task Force plays a key coordination role, it does not have the legal authority to "manage" the restoration effort. Nor does it direct any specific programs, including scientific research. These are instead encompassed within the diverse agency programs that collectively contribute to a restored Everglades. Each Task Force member retains its authority to manage the programs for which it is responsible and brings its unique expertise and perspective to the entire group. This forum allows policy representatives to further collaboration among the federal, state and tribal parties to achieve common restoration goals. This distinction is important. We are concerned that the GAO draft report could be read as indicating the Task Force is "in charge" of the restoration effort or can dictate executive action to its member agencies.

The draft GAO report recommends that the Task Force clarify the broad responsibilities of the Science Coordination Team or SCT, by specifying the plans and documents, including a science plan to focus on information gaps, a comprehensive monitoring plan, and progress reports for each plan, the SCT needs to complete. Additionally, the report recommends that the Task Force evaluate the SCT's staffing and personnel needs so that the SCT may carry out is responsibilities. Further, the draft report also recommends that the Task Force establish a process to ensure that key management issues requiring science planning are identified and that scientific issues are synthesized.

We agree that the responsibilities of the SCT can be clarified and that these issues should be addressed by the Task Force. However, we note that the ultimate decision on the role of the SCT, as well as the other recommendations for executive action contained in the report, must be made by the Task Force, rather than the Department of the Interior. We agree to raise these issues with the Task Force to determine how best to proceed.

Although our comments on the draft report are informed by the views of our South Florida Ecosystem Restoration Task Force (Task Force) colleagues, we are not responding on behalf of the Task Force. To do so would require the Task Force to disclose the contents of the draft report, which was not possible given the limits placed on its distribution. However, as soon as the report is publicly released, the Department looks forward to fully discussing the final report with the Task Force. We would appreciate the participation of GAO staff during that discussion so that the Task Force may fully address the report's recommendations for executive action and consider its response to the recommendations.

The Department appreciates the opportunity to provide comments on the GAO draft report. More specific comments are contained in the enclosure to this letter and certain technical comments have been provided directly to GAO staff. If you have any additional questions or need additional information, please contact Ann R. Klee, Counselor to the Secretary, at (202) 208-6182.

Sincerely,

Lynn Scarlett
Assistant Secretary
Policy, Management and Budget

Enclosure